

Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ZURICH AMERICAN INSURANCE  
COMPANY, a New York corporation,

Plaintiff,

v.

APEX LOGISTICS INTERNATIONAL,  
INC., a California corporation,

Defendant.

Cause No. 2:19-cv-02057-RSL

STIPULATION AND ORDER OF  
DISMISSAL WITH PREJUDICE UNDER  
Fed. R. Civ. P. 41(a)(1)(A)(ii)

**STIPULATION**

COME NOW all parties, Plaintiff Zurich American Insurance Company, and Defendant Apex Logistics International, Inc., by and through their undersigned counsel of record, and hereby stipulate that pursuant to FRCP 41(a)(1)(A)(ii), all claims which were or could have been asserted herein, by and between those parties, shall be dismissed with prejudice and without admission of liability, and with each party to bear its own costs, including attorney fees.

//

//

Respectfully submitted this 20<sup>th</sup> day of August, 2020.

<p>LAW OFFICES OF VI JEAN RENO</p> <p><u>/s/ Vi Jean Reno</u>  Vi Jean Reno, WSBA No. 9385  1420 Fifth Avenue, Suite 3000  Seattle, WA 98101  Telephone: (206) 622-4100  Fax: (206) 464-0461  Email: vjreno@renolawsea.com</p> <p>Attorneys for Plaintiff Zurich American Insurance Company</p>	<p>MARSHALL DENNEHEY WARNER COLEMAN &amp; GOGGI</p> <p><u>/s/ William R. Connor III</u>  William R. Connor III, NY Bar No. 1335249  287 Bowman Avenue, Suite 404  Purchase, New York 10577  Telephone: (914) 977-7300  Fax: (914) 977-7301  Email: WRConnor@MDWCG.com</p> <p>Pro Hac Vice Attorneys for Plaintiff Zurich American Insurance Company</p>
<p>KEESAL YOUNG &amp; LOGAN</p> <p><u>/s/ Igor V. Stadnik</u>  Igor V. Stadnik, WSBA No. 49123  1301 Fifth Avenue, Suite 3100  Seattle, WA 98101  Telephone: (206) 622-3790  Fax: (206) 343-9529  Email: igor.stadnik@kyl.com</p> <p>Attorneys for Defendant Apex Logistics International, Inc.</p>	<p>TISDALE LAW OFFICES, LLC</p> <p><u>/s/ Thomas L. Tisdale</u>  Thomas L. Tisdale, NY Bar No. TT5263  200 Park Avenue, Suite 1700  New York, New York 10166  Telephone: (212) 354-0025  Fax: (212) 869-0067  Email: ttisdale@tisdale-law.com</p> <p>Pro Hac Vice Attorneys for Defendant Apex Logistics International, Inc.</p>

//

//

//

//

//

//

ORDER

THIS MATTER having come on regularly before the undersigned Judge or the above-entitled Court upon the stipulation of the above-named parties, and the Court being fully advised in the premises, NOW THEREFORE

IT IS HEREBY ORDERED, ADJUDGED AND DECREED that all claims herein by and between the Plaintiff Zurich American Insurance Company, and Defendant Apex Logistics International, Inc. are hereby dismissed with prejudice and without costs to any party.

DATED this 21st day of August, 2020.



Honorable Robert S. Lasnik

Presented by:

/s/ Vi Jean Reno

Vi Jean Reno, WSBA No. 9385  
Law Offices of Vi Jean Reno  
1420 Fifth Avenue, Suite 3000  
Seattle, WA 98101  
Telephone: (206) 622-4100  
Fax: (206) 464-0461  
Email: [vjreno@renolawsea.com](mailto:vjreno@renolawsea.com)  
Attorneys for Plaintiff Zurich American Insurance Company

/s/ William R. Connor III

William R. Connor III, NY Bar No. 1335249  
Marshall Dennehey Warner Coleman & Goggi  
287 Bowman Avenue, Suite 404  
Purchase, New York 10577  
Telephone: (914) 977-7300  
Fax: (914) 977-7301  
Email: [WRConnor@MDWCG.com](mailto:WRConnor@MDWCG.com)  
Pro Hac Vice Attorneys for Plaintiff Zurich American Insurance Company

1        /s/ Igor V. Stadnik  
Igor V. Stadnik, WSBA No. 49123  
2        Keesal Young & Logan  
1301 Fifth Avenue, Suite 3100  
3        Seattle, WA 98101  
Telephone: (206) 622-3790  
4        Fax: (206) 343-9529  
Email: igor.stadnik@kyl.com  
5        Attorneys for Defendant Apex Logistics International, Inc.

6  
7        /s/ Thomas L. Tisdale  
Thomas L. Tisdale, NY Bar No. TT5263  
8        Tisdale Law Offices, LLC  
200 Park Avenue, Suite 1700  
9        New York, New York 10166  
Telephone: (212) 354-0025  
10       Fax: (212) 869-0067  
Email: ttisdale@tisdale-law.com  
11       Pro Hac Vice Attorneys for Defendant Apex Logistics International, Inc.

12  
13  
14  
15        CERTIFICATE OF SERVICE

16        I hereby certify that on August 20, 2020, I electronically filed the foregoing with  
17        the Clerk of the Court using the CM/ECF system which will send notification of  
18        such filing to:

19        William R. Connor III of Marshall Dennehey Warner Coleman & Goggi  
Pro Hac Vice Attorneys for Plaintiff Zurich American Insurance Company

20        Igor V. Stadnik of Keesal Young & Logan  
Attorneys for Defendant Apex Logistics International, Inc.

21        Thomas L. Tisdale of Tisdale Law Offices, LLC  
22        Pro Hac Vice Attorneys for Defendant Apex Logistics International, Inc.

23        Dated this 20<sup>th</sup> day of August, 2020.

24        /s/ Vi Jean Reno  
Vi Jean Reno